

# **EXHIBIT 3-B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LEK SECURITIES CORPORATION and :  
ROX SYSTEMS, INC. :  
Plaintiffs, : Case No.: 19-CV-02142  
: (RMB/BCM)  
: .  
: - against -  
: .  
: NICOLAS LOUIS, JONATHAN FOWLER, VOLANT :  
HOLDING, LLC d/b/a VOLANT TRADING, VOLANT :  
TRADING, LLC, VOLANT LIQUIDITY, LLC, AND :  
VOLANT EXECUTION, LLC :  
Defendants. :  
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**DEFENDANTS' PROPOSED SCHEDULING ORDER**

In light of Judge Berman's instructions on the record on April 1, 2019, and consistent with the interests of judicial economy and efficiency, defendants in the above action propose that the Court enter the following schedule regarding discovery and pretrial submissions:

- (a) All parties are to serve any objections and responses to any outstanding discovery requests, if not yet served, by Tuesday, April 9, 2019 and produce any documents not objected to by Friday April 12, 2019;
- (b) On Friday, April 12, 2019, or on such other day and time to be scheduled by the Court, the Court shall conduct a telephonic hearing to resolve any outstanding disagreements between the parties with respect to discovery objections;
- (c) Defendants are to file their responsive pleadings by Tuesday April 16, 2019;
- (d) The parties are to produce all remaining non-privileged documents responsive to any outstanding document requests, along with any privilege log, by Tuesday, April 23, 2019;

(e) Plaintiffs are limited to a total of 4 (four) depositions and all defendants (collectively) are limited to a total of 4 (four) depositions with no deposition lasting more than four hours of on-the-record time;

(f) All depositions in the case shall be completed Friday, May 10, 2019;

(h) Plaintiff shall serve expert disclosures under Fed. R. Civ. P. 26(a)(2), if any, by May 13, 2019;

(i) Defendants shall serve expert disclosures under Fed. R. Civ. P. 26(a)(2), if any, by May 23, 2019;

(l) The Parties shall submit a joint pre-trial order as set forth in Section 4(A), and any separate submissions required by Section 4(B) of Hon. Richard Berman's Individual Practices on or by May 29, 2019;

**SO ORDERED:**

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States Magistrate Judge